

Improvement Area—Directions for Use and Language

Scope

Directions for Use and Language (DFUL) focuses on plain label language, clearly defined terms, and identifying elements of 40 CFR. One of the main objectives of the DFUL Improvement Team is to identify paths for labels to comply with the 40 CFR, through language that is adequate and clear/readable instructions. Areas for label improvement include:

- Clarity and logical flow in the language/directions
- Differences between visuals and text for interpreting instructions
- 40 CFR 156.10 Direction for Use general requirements
- Identifying mandatory (enforceable) and advisory, and what should exist within each section of the label
- Consideration of the audience that utilizes the pesticide

The scope will include the master label, basic and distributor products, Multiple Products Packed Together (MPPT) or kits/co-packs, sub labels on the master label and other labeling (collateral labeling, supplemental labels).

To accomplish the scope of work, the DFUL Improvement Team should coordinate with the Enforceability Improvement Team when considering mandatory and advisory language and placement in specific sections of the label.

Team Members

The DFUL Improvement Team should include a well-rounded group of participants from states/tribes/territories, EPA, Industry, Associations, worker safety groups, extension and the end users that have experience in the following areas:

- Label Review or label language
- Professional, scientific, technical writers or expert in readability assessment
- FIFRA and 40 CFR

Resources

In addition to the resources listed previously, the DFUL Improvement Team may wish to research approaches to assessing readability. Other beneficial resources may include:

- The Code of Federal Regulation, Title 40
- EPA's Pesticide Labeling Questions & Answer [[HYPERLINK "https://www.epa.gov/pesticide-labels/pesticide-labeling-questions-answers"](https://www.epa.gov/pesticide-labels/pesticide-labeling-questions-answers)]
- Federal Plain Language Guidelines

Deliverables

Deliverables are categorized as short or long-term

Short-term Deliverables:

- Readability Policy for the assessment and review of language on a label
- Issue Paper – recommendations for readability, label review manuals, definitions, etc.

Long-term Deliverables:

- Suggested revisions to the label review and registration manuals
- Recommended revisions to 40 CFR

Timeline

The timeline for completion is estimated to be six months for short-term deliverable and one year for long-term deliverables. Also impacting the timeline for completion is the coordination with the Enforceability Improvement Team.

Barriers

Commented [FL(1)]: Are there any additional barriers to those listed in Section 2 that are specific to Directions for Use and Language?